

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BILLY GOAT TAVERN I, INC., BILLY GOAT)
MIDWEST, LLC, BILLY GOAT NORTH II,)
INC., BILLY GOAT VI, INC., BILLY GOAT)
INN, INC., BILLY GOAT TAVERN WEST,)
LLC, all d/b/a/ BILLY GOAT TAVERN, and all)
others similarly situated,)

Plaintiffs,)

v.)

SOCIETY INSURANCE,)

Defendant.)

Case No. 1:20-cv-02068

**DEFENDANT SOCIETY INSURANCE'S MOTION FOR EXTENSION OF TIME
IN WHICH TO ANSWER OR OTHERWISE PLEAD**

NOW COMES, Defendant, SOCIETY INSURANCE, ("Defendant") by and through its attorneys, Thomas B. Underwood, Michael D. Sanders, Michelle A. Miner and Amy E. Frantz of PURCELL & WARDROPE CHTD., and for its Motion for Extension of Time in Which to Answer or Otherwise Plead pursuant to Federal Rule of Civil Procedure 6(b), states as follows:

1. Federal Rule of Civil Procedure 6(b) states that when an act may or must be done within a specified time, the court, for good cause, may extend the time if a request is made before the original time or its extension expires. Fed. R. Civ. Proc. 6(b)(1)(A).

2. Defendant was served on April 13, 2020. Therefore, the deadline for filing its responsive pleading under Federal Rule of Civil Procedure 12(a)(i) is May 4, 2020.

3. Although the Northern District of Illinois issued Third Amended General Order 20-0012 ("General Order 20-0012") on April 24, 2020 extending "all deadlines, in all civil cases," including those set by the Federal Rules of Civil Procedure, for a period of 28 days, Defendant

has brought this motion in an abundance of caution, in order to ensure compliance with the court's filing deadlines.

4. Therefore, Defendant seeks an order confirming it has additional twenty-eight (28) days, or until June 1, 2020, to file its answer or other responsive pleading to Plaintiffs' Complaint for Declaratory Judgment.

5. Defendants have conferred with Plaintiffs' attorneys who agree General Order 20-0012 extends Defendant's time to answer or otherwise plead by 28 days but have advised they intend to file their own motion pursuant to Section 2c of General Order 20-0012, to ask the court to shorten the 28-day extension.

Date: May 4, 2020

Respectfully submitted,

Society Insurance

By: /s/ Thomas B. Underwood
Counsel for Defendant

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